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8 Attorneys for Defendants
9 ESSENTIAL CONSULTANTS, LLC and
10 MICHAEL COHEN
11

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 STEPHANIE CLIFFORD a.k.a.
16 STORMY DANIELS a.k.a. PEGGY
17 PETERSON, an individual,

18 Plaintiff,

19 v.

20 DONALD J. TRUMP a.k.a. DAVID
21 DENNISON, an individual,
22 ESSENTIAL CONSULTANTS, LLC, a
23 Delaware Limited Liability Company,
24 MICHAEL COHEN, an individual, and
25 DOES 1 through 10, inclusive,

26 Defendants.
27
28

Case No. 2:18-CV-02217-SJO-FFM

**DECLARATION OF BRENT H.
BLAKELY IN SUPPORT OF
MOTION TO STRIKE OR,
ALTERNATIVELY, DISMISS FIRST
AMENDED COMPLAINT**

Assigned for All Purposes to the
Hon. S. James Otero

Date: May 7, 2018

Time: 10:00 a.m.

**Location: 350 West 1st Street
Courtroom 10C, 10th Floor
Los Angeles, CA 90012**

Action Filed: March 6, 2018

DECLARATION OF BRENT H. BLAKELY

I, Brent H. Blakely, declare:

1. I am an attorney duly licensed to practice before all courts of the State of California and in the U.S. District Court for the Central District of California, among other courts. I make this declaration based on my own personal knowledge and, if called and sworn as a witness, I could and would competently testify hereto.

2. I am a partner of the law firm of Blakely Law Group, counsel of record for Defendant Essential Consultants, LLC (“EC”) and Defendant Michael D. Cohen.

3. Attached hereto as **Exhibit C** is a true and correct copy of an excerpt from the transcript of a nationally televised interview with Plaintiff Stephanie Clifford (“Clifford” or “Plaintiff”) that aired on *60 Minutes*. The excerpt was taken from the full transcript, which appears at the following URL: <https://www.cbsnews.com/news/stormy-daniels-describes-her-alleged-affair-with-donald-trump-60-minutes-interview/>.

4. Attached hereto as **Exhibit D** is a true and correct copy of the article entitled, “*EXCLUSIVE: How Stormy Daniels tried to sell story about her one-night-stand with Donald Trump for \$200,000 THREE weeks before the election but worked out a deal with Trump's lawyer Michael Cohen after she got no takers,*” which was published by the *Daily Mail* on or about March 29, 2018, at the following URL: <http://www.dailymail.co.uk/news/article-5554437/Stormy-Daniels-tried-sell-story-sex-Trump-200-000-weeks-election.html>.

5. Attached hereto as **Exhibit E** is a true and correct copy of the article entitled, “*Stormy Daniels says Trump scandal has been good for business,*” which was published by *CNN* on or about March 11, 2018, at the following URL: <https://www.cnn.com/2018/03/10/politics/stormy-daniels-interview/index.html>.

6. Attached hereto as **Exhibit F** is a true and correct copy of the article entitled, “*One Night with Stormy Daniels, the Hero America Needs,*” which was published by *Rolling Stone* on or about March 9, 2018, at the following URL:

1 [https://www.rollingstone.com/culture/features/one-night-with-stormy-daniels-the-](https://www.rollingstone.com/culture/features/one-night-with-stormy-daniels-the-hero-america-needs-w517692)
2 [hero-america-needs-w517692](https://www.rollingstone.com/culture/features/one-night-with-stormy-daniels-the-hero-america-needs-w517692).

3 7. Attached hereto as **Exhibit G** is a true and correct copy of the article
4 entitled, “*So True? So False? Did Donald Trump Cheat on Melania With a Porn*
5 *Star?!?*”, which was published by *E! News* on or about October 12, 2011, and available
6 at the following URL: [http://www.eonline.com/news/269058/so-true-so-false-did-](http://www.eonline.com/news/269058/so-true-so-false-did-donald-trump-cheat-on-melania-with-a-porn-star)
7 [donald-trump-cheat-on-melania-with-a-porn-star](http://www.eonline.com/news/269058/so-true-so-false-did-donald-trump-cheat-on-melania-with-a-porn-star).

8 8. Attached hereto as **Exhibit H** is a true and correct copy of my March 27,
9 2018 letter to counsel for Clifford, Michael Avenatti, setting forth the basis for
10 defendant Michael Cohen’s motion to strike Clifford’s second cause of action for
11 defamation pursuant California Code of Civil Procedure § 425.16.

12 9. Attached hereto as **Exhibit I** is a true and correct copy of my March 30,
13 2018 email to Mr. Avenatti, wherein I stated, among other things, that Mr. Cohen
14 intended to concurrently file a Motion to Dismiss under FRCP 12(b)(6) on the basis
15 that Plaintiff’s second cause of action fails to state a claim for relief.

16 10. On April 2, 2018, I participated in a Local Rule 7-3 conference of
17 counsel with Mr. Avenatti regarding the instant motion. During the conference, Mr.
18 Avenatti (incorrectly) asserted that California’s anti-SLAPP law does not apply
19 because Mr. Cohen was in New York when the allegedly defamatory statement was
20 made. No agreement to resolve the motion was reached.

21 11. On or about March 25, 2018, Plaintiff appeared on *60 Minutes* with
22 Anderson Cooper. It was widely reported, including by *CNN* and the *New York*
23 *Times*, that the show had twenty-two million viewers, according to *Nielson*, and drew
24 the highest ratings for *60 Minutes* in ten years.

25 12. Between on or about March 7, 2018 and on or about April 5, 2018, Mr.
26 Avenatti has appeared on no less than thirty-six national television shows, to talk
27 about this case. Attached hereto as **Exhibit J** is a chart listing each of those
28 appearances.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on April 9, 2018, at Los Angeles, California.

4 /s/ Brent H. Blakely

5 BRENT H. BLAKELY

Exhibit C

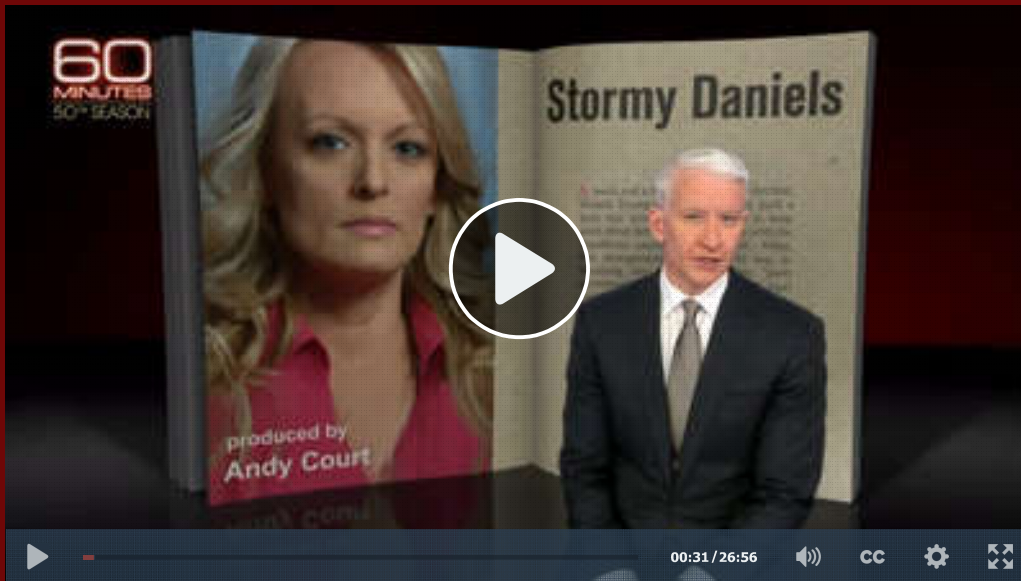
Breaking Trump touts tax reform in West Virginia / f t



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Why Stormy Daniels decided to go public



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STORMY DANIELS DESCRIBES HER ALLEGED AFFAIR WITH DONALD TRUMP

The adult-film star and director is being threatened with financial ruin, but she wants to set the record straight about her alleged affair with Donald Trump

2018
MAR 28 CORRESPONDENT
ANDERSON COOPER

FACEBOOK
f

TWITTER
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REDDIT
r

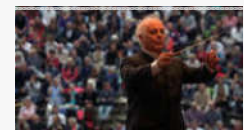
FLIPBOARD
F

A week and a half before the 2016 election, Donald Trump's personal attorney paid a porn star named Stormy Daniels to keep quiet about her alleged relationship with the Republican candidate for president. Today, that arrangement is well on its way to becoming the most talked-about "hush agreement" in history, with potential legal and political implications for the president. Through his spokesman, Mr. Trump has denied having an affair with **Stormy Daniels**, and his lawyers are now threatening her with financial ruin, saying she has to pay \$1 million dollars every time she violates her agreement to stay silent. But that didn't stop her from coming on 60 Minutes.

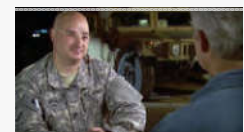
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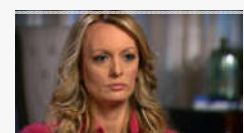
Bridging the Middle East conflict



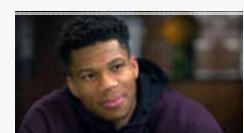
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The Stormy Daniels interview



'The Great'



Stormy Daniels | CBS NEWS



FULL STORMY DANIELS INTERVIEW TRANSCRIPT BELOW:

Anderson Cooper: For sitting here talking to me today you could be fined a million dollars. I mean, aren't you taking a big risk?

Stormy Daniels: I am.

Anderson Cooper: I guess I'm not 100% sure on why you're doing this.

Stormy Daniels: Because it was very important to me to be able to defend myself.

Anderson Cooper: Is part of talking w-- wanting to set the record straight?

Stormy Daniels: 100%.

Anderson Cooper: Why does the record need to be set straight?

Stormy Daniels: Because people are just saying whatever they wanted to say about me, I was perfectly fine saying nothing at all, but I'm not okay with being made out to be a liar, or people thinking that I did this for money and people are like, "Oh, you're an opportunist. You're taking advantage of this. Yes, I'm getting more job offers now, but tell me one person who would turn down a job offer making more than they've been making, doing the same thing that they've always done?"

Anderson Cooper: A lotta people are using you for a lotta different agendas.

Stormy Daniels: They're trying to. Like, oh, you know, Stormy Daniels comes out #MeToo. This is not a 'Me Too.' I was not a victim. I've never said I was a victim. I think trying to use me to-- to further someone else's agenda, does horrible damage to people who are true victims.

Stormy Daniels' real name is Stephanie Clifford. She's 39 years old, from Baton Rouge, Louisiana, and has been acting in, directing, and writing adult films for nearly 20 years. She was one of the most popular actresses in the adult industry when she was introduced to Mr. Trump at a celebrity golf tournament in Lake Tahoe in July, 2006. She says he invited her to dinner, and she met him at his hotel suite.

Anderson Cooper: How was the conversation?

Stormy Daniels: Ummm (LAUGH) it started off-- all about him just talking about himself. And he's like-- "Have you seen my new magazine?"

coming out has come out anyway, and guess what? I don't have a million dollars. (LAUGH)
You didn't even buy me breakfast.

15 months after she signed the non-disclosure agreement, in January 2018, the Wall Street Journal published this story, quoting anonymous sources, saying that Mr. Trump's attorney Michael Cohen had paid her for her silence. Daniels says she was not the source of the story. But once it was published, she says she was pressured by her former attorney and former business manager to sign statements that Michael Cohen released publicly, denying she'd had an affair with Mr. Trump.

Anderson Cooper: So you signed and released-- a statement that said I am not denying this affair because I was paid in hush money I'm denying it because it never happened. That's a lie?

Stormy Daniels: Yes.

Anderson Cooper: If it was untruthful, why did you sign it?

Stormy Daniels: Because they made it sound like I had no choice.

Anderson Cooper: I mean, no one was putting a gun to your head?

Stormy Daniels: Not physical violence, no.

Anderson Cooper: You thought that there would be some sort of legal repercussion if you didn't sign it?

Stormy Daniels: Correct. As a matter of fact, the exact sentence used was, "They can make your life hell in many different ways."

Anderson Cooper: They being...

Stormy Daniels: I'm not exactly sure who they were. I believe it to be Michael Cohen.

"THE PAYMENT OF THE MONEY JUST CREATES AN ENORMOUS LEGAL MESS"

President Trump's attorney Michael Cohen has denied ever threatening Stormy Daniels. The payment Cohen made to her is now the subject of complaints to the Justice Department and the Federal Election Commission, alleging that it was an illegal campaign contribution.

What makes the dispute between Stormy Daniels and the president more than a high-profile tabloid scandal is that her silence was purchased eleven days before the presidential election, which may run afoul of campaign finance laws. The president's long-time lawyer Michael Cohen says he used \$130,000 of his own money to pay Stormy Daniels. Cohen has said the money was not a campaign contribution. But Trevor Potter, a former chairman of the Federal Election Commission appointed by President George H.W. Bush, told us he doesn't agree.

Exhibit D

4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online

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EXCLUSIVE: How Stormy Daniels tried to sell story about her one-night-stand with Donald Trump for \$200,000 THREE weeks before the election but worked out a deal with Trump's lawyer Michael Cohen after she got no takers

- Stormy Daniels's manager offered her client's story to celebrity magazines, television shows and websites in the run-up to the 2016 election
- The titillating tell all was peddled to the media around October 17, three weeks before the election
- But the adult actress apparently had no takers as Hillary was expected to win at the time, and Stormy's story would have been worth a fraction of her asking price
- Daniels then accepted the \$130k from Trump's lawyer Michael Cohen, who had made her the offer after Trump won the nomination
- 'It looks to me that she accepted Cohen's money because she could not get the money she wanted from anyone else,' one media executive said
- Daniels told her version of her tryst with Trump to Anderson Cooper on CBS's 60 Minutes on Sunday
- Stormy made it seem as though she did not seek to sell her story, telling Cooper: 'Suddenly people are reaching out to me again, offering me money. Large amounts of money'

By MARTIN GOULD FOR DAILYMAL.COM

PUBLISHED: 14:30 EDT, 29 March 2018 | UPDATED: 16:08 EDT, 29 March 2018

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The porn star whose bombshell claims about sex with **Donald Trump** have rocked his presidency desperately tried to sell her story for \$200,000 — nearly 50 percent more than the 'hush' money she received, DailyMail.com can reveal.

Stormy Daniels's manager made the rounds of celebrity magazines, television shows, and websites in the run-up to the 2016 presidential election, hoping someone would bite.

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► Double twinning!
Jessica Simpson
matches floral dresses
with daughter Maxwell
as Eric and Ace also
pair up in cute Easter
family snap



4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online

She promised a story of Stormy's titillating sexcapade with the man who would soon be in the Oval Office.

But with polling day getting ever closer, and her chances of a payday getting more remote as Trump appeared doomed to lose to **Hillary Clinton**, Daniels gave up on her money chase and accepted the \$130,000 that Trump attorney Michael Cohen had dangled in front of her in a bid to keep the story quiet.

Cohen insists he paid the money out of his own pocket and was not reimbursed by either the Trump campaign or the Trump Organization.

'It looks to me that she accepted Cohen's money because she could not get the money she wanted from anyone else,' one media executive said.



Stormy Daniels's tried to sell her story about sex with Trump to multiple celebrity magazines, television shows, and websites in the run-up to the 2016 election

► **Lisa Rinna, 54, displays toned figure in skimpy orange bikini after Real Housewives of Beverly Hills fight**
Actress took to Snapchat to show off body



► **Andie MacDowell, 59, has 'no shame' with sex scenes in new film and 'yoga, sleep' keeps her a size 4**
Actress romps with Chris O'Dowd in flick



► **Kendra Wilkinson CONFIRMS she is splitting from husband Hank Baskett in tearful Instagram post**
'10 years. I did everything I could,' she said in clip



► **'I was in shock. She really just came for me': Woman 'attacked' by Blac Chyna with stroller at Six Flags claims she only patted Dream's hand**



► **She's his ride or die**
Cookie rescues Lucious by hiding a RAZOR under her tongue in heart-stopping spring premiere of Empire
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► **'You'd die if I told you who it was!'** Kaley Cuoco reveals she dumped famous ex because he was such a bad TIPPER - so just who is her 'cheap' ex?



► **Love on the lawn!**
Trump praises First Lady Melania for organizing Easter Egg Roll at the White House and gives her a kiss for the cameras



► **Kyle Richards, 49, proves she's still a pinup as she poses in string bikini for eye-popping selfie**
Real Housewives Of Beverly Hills star



► **Tori Spelling celebrates Easter with her family... after 'mental breakdown' and three police calls**
Actress-turned-reality star is 45 next month



► **Rory McIlroy, a Canadian hockey star and top chef: New book looks into Meghan Markle's rumored past romances before she met Prince Harry**



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4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online



Stormy's manager had promised a titillating story of their one-night-stand. Daniels provided this picture of herself with Trump to back her claim

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► **The Ricky Gervais Guide to Life: The comedian's take on everything from fatherhood to flying First Class**
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► **Tia Mowry dons flowing pink frock over pregnant belly for family-filled baby shower in Beverly Hills**
The 39-year-old actress was all-smiles



► **John Legend leaves NYC with Chrissy Teigen and their daughter Luna in a silk robe... after winning performance in Jesus Christ Superstar Live**



► **Justin Theroux hugs Paul Rudd in NYC... as 'he has barely spoken to Jennifer Aniston since split'**
Newly single actor was dressed casually



► **Incredible footage shows Blac Chyna appear to throw Dream's stroller at woman before being held back during huge melee at Six Flags park**



'It was like the least surprising thing!' Seth Rogen says porn star Stormy Daniels told him

DailyMail TV

Stormy Daniels tried to sell story weeks before election

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Meghan Markle, Prince Harry



George Michael helped couple have 'miracle baby'

4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online



DailyMail.com was among the outlets approached by Stormy's manager Gina Rodriguez in October 2016. We turned her down.

Daniels told her version of her tryst with Trump to Anderson Cooper on CBS's 60 Minutes on Sunday. Cooper reported that she had sold her story to a tabloid magazine for \$15,000 years before, but it did not run because of libel threats from Cohen and she was never paid.

After Trump won the Republican presidential nomination interest in Daniels's story grew and she claims she turned down offers to speak.

Stormy made it seem as though she did not seek to sell her story, telling Cooper: 'Suddenly people are reaching out to me again, offering me money. Large amounts of money. Was I tempted? Yes - I struggle with it,' she told Cooper.

Then, she claims, Cohen approached her with his \$130,000 offer.

But the fact is that Stormy's team was aggressively pursuing a deal to sell her story to the highest bidder.

During the 60 Minutes interview, Daniels, 39, said she had 'swatted' the future president's backside a couple of times with a copy of Trump Magazine and that they had had sex just once in a Nevada hotel suite.

Cooper did not ask her to elaborate on what the sex was like.

Daniels, 39, an adult film actress whose body of work includes The Witches of Breastwick, Camp Cuddlypines Powertool Massacre, and Spreading My Seed, mused to Cooper on whether she should now be speaking out.

She pointed out she was not being paid for the interview and when Cooper asked her if the notoriety would help her 'Make America Horny Again' tour of strip clubs, she replied that she could end up being shunned.



▶ **about alleged Donald Trump affair over a decade ago**



▶ **Donald Trump Jr and estranged wife Vanessa smile and laugh as they put on a united front while taking their kids to the White House Easter Egg Roll**

▶ **Hair-raising! Jared Leto, 46, sports vibrant colorful blue track pants and a seriously shaggy beard for an afternoon stroll in New York City**



▶ **Willow Smith celebrates Easter by wrapping her long dreadlocks in beautiful pastel-colored ribbons Will and Jada's daughter is now 17**



▶ **'I feel like an a**hole': Busy Philipps breaks down in TEARS as she admits she left her nine-year-old daughter's beloved teddy bears in a Hawaii hotel**



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Jennifer Lopez and Alex Rodriguez: Superstar

4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online



Daniels ultimately did not receive any takers on her story because Hillary Clinton was expected to secure the presidency, meaning her story would have been worth a fraction of her asking price



She was then forced to accept the \$130k 'hush money' from Trump's lawyer Michael Cohen (left) who had made her the offer after Trump won the nomination

'I could automatically be alienating half of my fan base right at this very moment,' she said.

But in 2016, Daniels saw her opportunity to cash in on the one-night-stand that she says occurred 10 years earlier, and she had a picture of herself in a body-hugging cropped black tank top standing next to Trump in a yellow golf shirt and red cap, to back her claim.



► couple hold hands as they enjoy Easter dinner date in West Hollywood
Dined at Craig's



► Bikini-clad Elsa Pataky, 41, shares a kiss with hubby Chris Hemsworth as he grabs her pert derrière on the beach in Australia with Matt Damon

► EXCLUSIVE: Did Liev Schreiber's girlfriend skip March For Our Lives because she's pro-gun? Photos show beauty queen and family posing with rifles



► 'A perfect morning!': Makeup-free Jennifer Garner leaves Ben Affleck with the kids as she hikes with a cute blonde pal in the hills of Hawaii



► Farrah Abraham sports baby blue floral dress and slides for Easter brunch with nine-year-old daughter Sophia in Los Angeles
Made a cute duo



► REVEALED: Don Jr. and estranged wife Vanessa spent Easter TOGETHER with kids as his alleged ex-lover Aubrey O'Day marks holiday with sassy pics



► Meghan Markle's tortoiseshell sunglasses are FINALLY back in stock - six months after they sold out when she wore them on her first official outing with Harry



► 'It's powerful, but simple': Hugh Jackman reveals the secret behind his unbreakable marriage to wife Deborah-Lee Furness as they celebrate 22 years



► She can't stop! Miley Cyrus goes braless in see-through dress and gets spanked by the Easter bunny in risqué videos
Sexy photo session



► Drake sports 'album hour' dark circles under his eyes... as his legal battle with Detail heats up

4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online

Rodriguez pushed Daniels's story to the media around October 17, three weeks before the election and the same day that Cohen registered a limited liability company called Essential Solutions in Delaware. Rodriguez said she was keen for the story to appear before the final presidential debate between Trump and Clinton, set for October 19.

Some 10 days later, Essential Solutions paid Daniels \$130,000 after she signed an agreement not to talk about Trump. The agreement used pseudonyms — David Dennison for Trump and Peggy Peterson for Daniels.

Daniels and her attorney Michael Avenatti claim the agreement is non-binding because Trump did not sign in, although Cohen did.

Trump, then 60, was playing in a celebrity golf tournament at the Edgewood Tahoe Golf Course in Stateline, Nevada, in July 2006, finishing 62nd in a field of 80. Daniels was working a gifting suite for Wicked Pictures, one of the leading porn companies, and says he invited her up to his suite at the Harrah's Casino.

Trump's wife Melania had given birth to their only child, Barron, just three months earlier.

Once she got to the room, Daniels says Trump showed her a copy of his new magazine — which had a picture of the businessman in a navy suit and blue tie on the cover under the caption 'On Top of the World.'

She says she asked him whether boasting about himself normally worked with women, a question she says surprised him.

'He looked very taken aback, like he didn't really understand what I was saying,' she told Cooper.

'And I was like, "Someone should take that magazine and spank you with it." I don't think anyone's ever spoken to him like that, especially, you know, a young woman who looked like me.

'And I said "Give me that," and I just remember him going, "You wouldn't. Hand it over." And so he did, and I was like, "Turn around, drop 'em."

'So he turned around and pulled his pants down a little,' she added saying he was wearing underwear. 'I just gave him a couple swats.'

Daniels — real name Stephanie Clifford — said Trump then stopped talking about himself and even offered to see if he could persuade NBC executives to allow her to appear on his TV show, *Celebrity Apprentice*.

White House denies Trump has sexual relationship with Stormy



Attorney Michael Avenatti, who is representing Daniels, says the \$130,000 agreement was not binding because Trump did not sign it

R&B star grabbed a bite to eat in Calabasas



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► Chrissy Teigen brings up Bill O'Reilly's sexual harassment settlement as she hits back at the former Fox News host for mocking NBC's Jesus Christ Superstar



► Inside the decadent Kardashian-Jenner Easter: KUWTK stars celebrate with gold eggs, a 10ft tall flower bunny and a CASH HUNT for the kids



► Daddy's little girl! Bradley Cooper kisses one-year-old daughter Lea at Easter party with model mom Irina Shayk Easter party in Brentwood, California



► Tom Hardy as James Bond: Actor teases fans he's the next 007 as he reacts to Daniel Craig quipping the role in April Fools' joke It was all done in fun



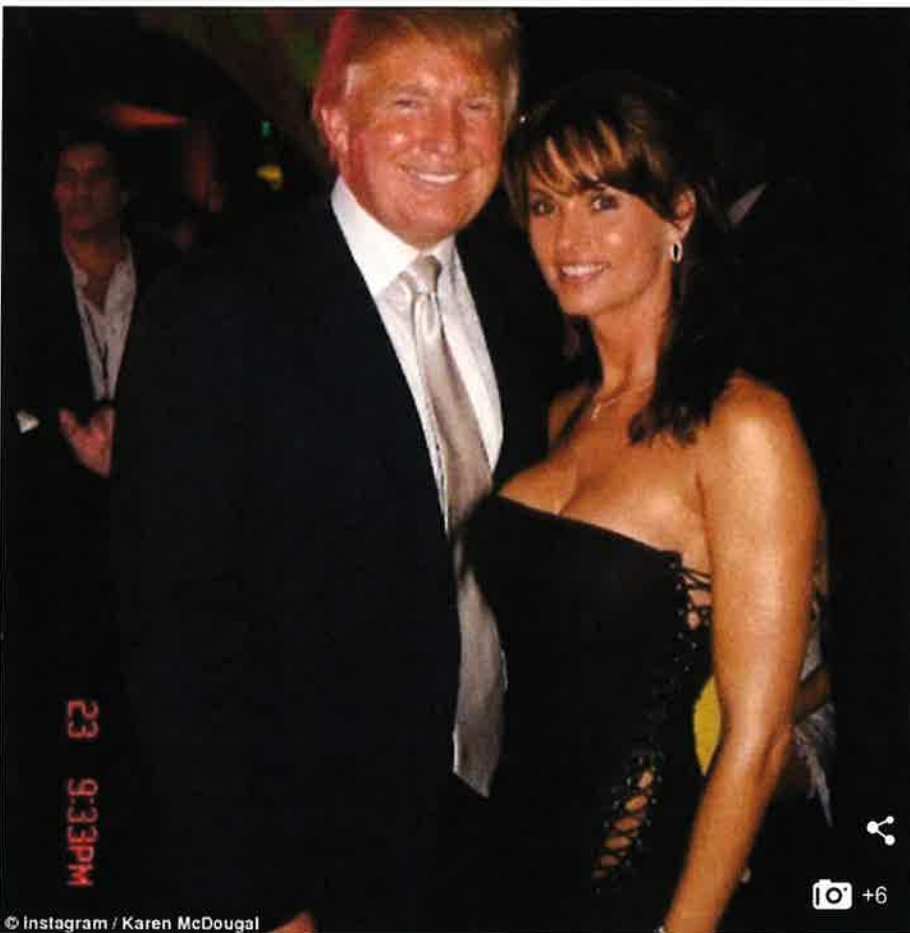
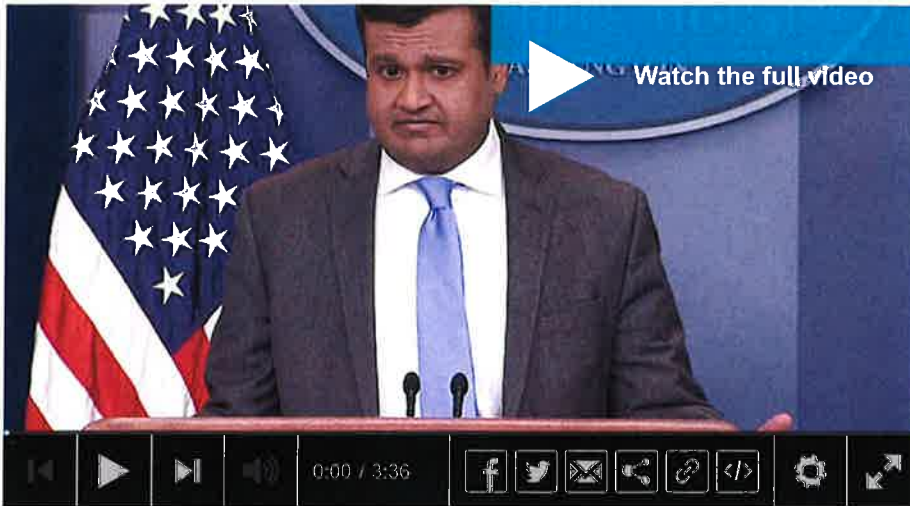
► Prince Edward and Sophie Wessex's 10-year-old son Viscount Severn is spotted DRIVING family's Land Rover at Windsor Castle



Blac Chyna says she's 'all love' and posts

4/2/2018

Stormy Daniels tried to sell story on Trump weeks before election | Daily Mail Online



Daniels's account had many similarities to one from former Playboy centerfold Karen MacDougal, who says she had a year-long affair with Trump starting in June 2006

DailyMail

Trump says Stormy Daniels is not his type



▶ video of daughter Dream hugging her brother at Six Flags just moments before she THREW a stroller at a woman

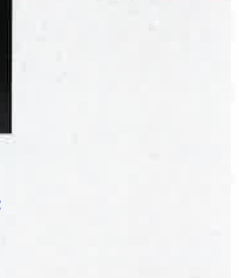


▶ Human Ken Doll Rodrigo Alves catches the eye in a blue velvet suit as he enjoys a night out in London

Wore a sheer lace shirt and a matching corset

▶ Maria Shriver and kids attend church service days after Arnold Schwarzenegger's open-heart surgery

With her children Patrick, Katherine and Christina



▶ Stormi's first Easter: Kylie Jenner joins beau Travis Scott in swooning over baby daughter during lavish festivities at family home in Hidden Hills



▶ Lupita Nyong'o and Angela Bassett attend revival of Tony award winning Children of a Lesser God

Actresses were in high spirits posing for pics



▶ Kim Kardashian flaunts her TINY waist on Instagram in Fendi fur...after Photoshop fail

She's a top star who only has taste for the finest things



▶ Topless Toni Garm flaunts her flawless figure on bikini break with gal pals in Miami

The blonde beauty enjoyed a sunny day in Miami with her friends



▶ John Legend leads all-star cast in rocking production of Jesus Christ Superstar Live in NYC

The singer rocked out on Easter Sunday



▶ Meghan Markle's father is 'terrified' of walking her down the aisle but will do it 'to represent America because he worships her', his son reveals

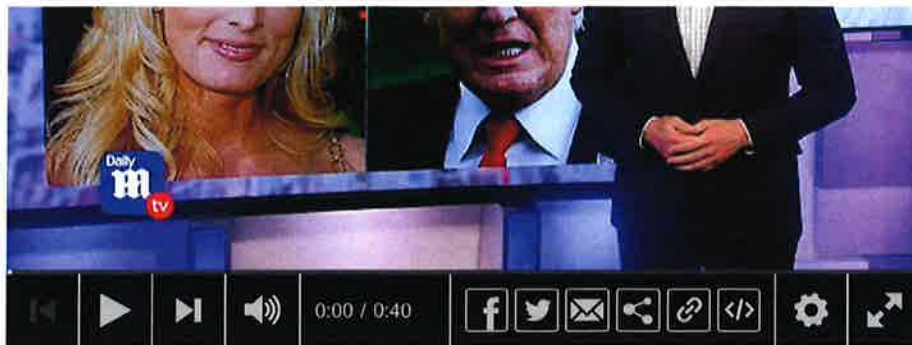


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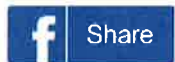
After dinner in the room, she says she went to the bathroom and when she returned she found Trump 'perched' on the edge of the bed.

'I realized exactly what I'd gotten myself into. And I was like, "Ugh, here we go." And I just felt like I had it coming for making a bad decision for going to someone's room alone and I just heard the voice in my head, "Well, you put yourself in a bad situation and bad things happen, so you deserve this."

They then had unprotected sex, she claims, although Cooper did not ask her for any further details. She said she did not consider herself a victim as the sex was consensual, even though she insists she was not physically attracted to him.

Trump denies ever having sex with Daniels, but the \$130,000 payout could bring more problems to his presidency as there are now calls to have it investigated as an illegal campaign contribution from Cohen.

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Daniels said she stayed in contact with Trump and went to his suite at the Beverly Hills Hotel the following year to discuss her possible appearance on *Celebrity Apprentice*. She said he made her watch a *Shark Week* documentary and then came on to her but she left without having sex.

Daniels's account had many similarities to one from former *Playboy* centerfold Karen MacDougal, who says she had a year-long affair with Trump starting in June 2006, the month before his alleged night with Daniels.

Both said Trump had told them they reminded him of his daughter Ivanka, and both said he told them that he and Melania slept in separate rooms despite only being married for around 18 months at the time.

Clifford said Trump offered to pay her for the sex. Cooper did not ask Daniels whether he made a similar offer to her.

Stormy Daniels: I was threatened to drop Trump affair story.



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Exhibit E

Stormy Daniels says Trump scandal has been good for business

By [Nick Valencia](#) and [Dakin Andone](#), CNN

Updated 11:10 AM ET, Sun March 11, 2018



Source: CNN

Stormy Daniels: Controversy is overshadowing my films 02:23

Pompano Beach, Florida (CNN) — Interest in Stephanie Clifford, the porn star known as Stormy Daniels, is at an all-time high, and she's using it to her advantage, she told CNN after a performance Friday at the Solid Gold gentleman's club in Pompano Beach, Florida.

Clifford has been in the news since The Wall Street Journal reported in January that [President Donald Trump's personal lawyer, Michael Cohen, paid her \\$130,000 weeks](#) before the 2016 presidential election to keep quiet about an alleged affair with Trump.

In her interview with CNN, Clifford wouldn't answer any questions about the lawsuit or comment on Trump or their alleged relationship.

She did, however, talk about how all the attention has affected her life.

"Now, yes, I'm more in demand," Clifford told CNN. "Like I said in [the Rolling Stone interview](#), if somebody came up to you and said, 'Hey, you know that job that you've been doing forever? How about next week I pay you quadruple,' show me one person who's going to say no."

Clifford has been in the adult entertainment business for 17 years, she said. According to her website, she started out as a dancer in Louisiana before moving to Los Angeles to make porn films. Now, she said, she not only acts but writes and directs films as well.

"The phone has been blowing up," said Craig Korka, manager of the Solid Gold club. "Interest is volcanic. It's like the perfect storm."



Related Article: Read CNN's interview with Stormy Daniels

Clifford's name dominated headlines this week after she sued Trump, saying a nondisclosure agreement was void because the President never signed it. On Friday, hours before Clifford went out on stage, Cohen told CNN he used funds from his own home equity line of credit to make the payment.

And later, an email provided to CNN by Clifford's attorney showed Cohen used his Trump Organization signature in an email. Her lawyer, Michael Avenatti, said he believes it's proof that Cohen was acting in a professional capacity as Trump's attorney in the negotiations.



Stephanie Clifford, better known as Stormy Daniels, talks to CNN's Nick Valencia on Friday in Pompano Beach, Florida.

Cohen has never stated the reason for payment. He and the White House have said Trump had no knowledge of the payment, and the White House has said Trump has denied having a relationship with Clifford.

While the notoriety has put a bigger spotlight on Clifford's career, she said, the attention also has its downsides.

"It's sort of been a double-edged sword where a lot of people are very interested in booking me for dancing and stuff like this," Clifford told CNN, taking away time from films and projects she's supposed to be promoting.

What bothers her, she said, is the "flat-out lies" that have been spread about her. "Like that I'm broke," she said. "I'm actually one of the most successful adult movie directors in the business."

In 2014, Clifford was inducted into the Adult Video News Hall of Fame. She also has appeared in such mainstream box-office hits as "The 40-Year-Old Virgin" and "Knocked Up."

But even Clifford admitted she's capitalizing on the moment when interest in her career is at an all-time high. The attention has helped her in the short term, as more people turn out for shows on her "Make America Horny Again" tour (a play on Trump's campaign slogan "Make America Great Again").

#651



Related Article: Porn star's attorney: Cohen used his Trump Organization signature in email

"I'm getting more dance bookings. I usually only dance once a month, and now I'm dancing three or four times a month. So that's been really great," she said.

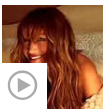
CNN's Nick Valencia reported from Pompano Beach, and Dakin Andone wrote and reported from Atlanta. CNN's Hadas Gold, Konstantin Toropin and Veronica Stracqualursi contributed to this report.



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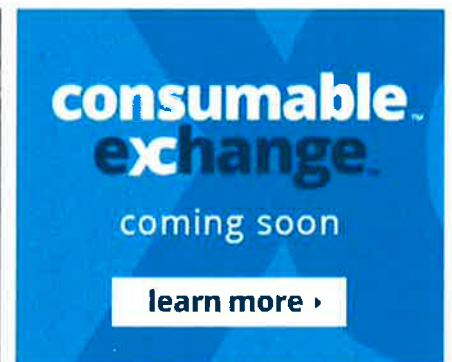


White House scolds Cabinet officials after embarrassing ethics reports

Exhibit F

RollingStone

One Night with Stormy Daniels, the Hero America Needs



Frozen g-strings, squirt guns and hot wax – how Trump's alleged porn-star fling is unapologetically cashing in on a presidential scandal

By Denver Nicks
March 9, 2018



Stormy Daniels answers the door of her Houston hotel room wearing little

Around the Web



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athletic shorts and a green Pantera tank top over a sports bra, her long blond hair in a loose ponytail. We shake hands and she jumps back onto her bed, sitting up with her legs tucked under her in half lotus. Her assistant and longtime friend Kayla Paige, a retired adult-film actress and wife of Limp Bizkit founding member Sam Rivers, buzzes with aimless energy around the room they're sharing. They'd only just woken up and are in the middle of a discussion about penile implants, which I confess I didn't know is a thing. Then Paige half-jokingly wonders if she needs vaginal lip reduction surgery and drops her pants for reference. She isn't wearing panties.

Daniels rolls her eyes and laughs. I stand for a moment unsure where to sit, then motion to the other bed, which Paige says I can sit on. "I don't have anything," she assures me with a chuckle. I sit on the edge of the bed and Daniels and I make small talk. Her safe word, I learn, is "penguin."

"Penguins have terrible breath," she says.

"How do you know penguins have terrible breath?" I ask.

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"They smell like they've been eating bad vagina. I got to pet one at a zoo – if you ever go to the zoo, the penguin habitat is the stinkiest one. It smells like a really bad porn set."

She goes on like this for half an hour, bouncing from topic to topic. They had dinner last night with retired adult-film icon Randy Spears, an old friend; they need to do a Walmart run later; a fan sent Stormy a piece of very expensive Louis Vuitton luggage. Finally we get to the business of a proper interview. I ask what everyone is getting wrong about Stormy Daniels right now.

"If I was nominated for best sex scene at multiple award shows," Daniels says, "how was I not current?"

"That I somehow needed this current situation to happen to revive or restart my career," she says, without skipping a beat. She's been doing porn and stripping consistently for the past 15 years and had 17 total nominations at last year's adult-film awards shows, including for director of the year. "If I was nominated for best sex scene at multiple award shows," she says, "how was I not current?"

In the month since news reports first revealed that Donald Trump's attorney, Michael Cohen, **paid Stormy Daniels \$130,000**, allegedly in exchange for her silence about a 2006 tryst the then-27-year-old porn star had with Trump, her celebrity had skyrocketed. She appeared on Jimmy Kimmel, was parodied on *Saturday Night Live*, and embarked on a nationwide "Make America Horny Again" strip club tour. Through Cohen, she issued a statement denying the affair, but then in public seemed to fan the story's flames **by coyly denying the denial**.

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But she was also in the uncomfortable position of being a political problem for the president of the United States. Behind the scenes, she was in a tug of war with Cohen, as she sought to free herself from the nondisclosure agreement she'd signed – in a cruel twist, after news broke of the alleged affair between Donald Trump and Stormy Daniels, Stormy Daniels was the one person on Earth forbidden from talking about it.

Hated by the right, mocked by the left and pursued doggedly by unscrupulous press over a decade-old tryst with a man twice her age, Daniels was at that very center of the swirling centrifuge of wide-eyed WTF weirdness that is America in the age of Trump. And in the midst of all of it she was doing a national strip-club tour with a title that played on Trump's campaign slogan. At a time when many people might attempt seclusion, Daniels was, in the parlance of our times, leaning in.





Stormy Daniels in 2006, two years after she won Best New Starlet at the AVNs. (Gordon Randelle/REX/Shutterstock)

My inbox is flooded daily with unsolicited press releases, and this meeting began with one such message, promoting a "Make America Horny Again" tour date at a club on Long Island. The release was riddled with typos, so I did what anyone does with something like that in 2018: posted a screenshot of it with a snarky tweet pointing out how Trump's alleged porn-star ex-mistress's PR people can't spell. Daniels herself responded minutes later, "Haha! Not from my PR team. But my guess is someone from the club is gonna get in trouble for not proofreading."

Moments later, **she followed that up**: "Side note: Wish I had a PR team. That sounds very fancy...although I'd make said team do other mundane shit just so I could say things like 'When you're done spelling checking the release about anal, can you get my Gstring out of the freezer & help me scrape the candle wax off it?'" In the exchange that followed she sent me a picture of her actual G-strings in the freezer – "overpriced butt floss," she called them.

Needless to say, I was intrigued. She seemed funny and quick, but also thick-skinned and refreshingly playful in response to my light Internet derision. I asked if she'd be up for an interview, DM'd her my phone number. A few days later I got a call from "No Caller ID."

"Hello?" I said, hesitantly.



"You shouldn't answer calls from blocked numbers," a female voice said. I stayed silent. "This is Stormy," she said.

"Oh," I said. "I thought you were my ex-girlfriend."

"Not yet!" Daniels chirped.

We arranged to meet in Houston a few days later, when her tour passed through town.

"I have two choices," Daniels says of the Trump scandal. "Sit at home and feel sorry for myself, or make lemonade out of lemons."

Sitting across from one another in her hotel room, she tells me a little about her childhood. Daniels was born in Baton Rouge, Louisiana, in 1979, and grew up with her mom. Her dad was rarely around. Her name at birth was Stephanie Clifford, but Stormy is in every other sense her real name – it's what she went by growing up before it became her stage name. "Up until this, if someone called me Stephanie, I thought you were the IRS," she says. "No one calls me Stephanie. My own child doesn't even know that Stephanie is my name."

She left home at 17 and soon started stripping, and then doing porn. She became one of only a handful of contract girls with Wicked Pictures, one of the industry's leading companies, and in 2004 won "Best New Starlet" at the AVN Awards, often called "the Oscars of porn." She continued acting and directing under contract with Wicked until January when, she says, she left the company and signed a contract with Digital Playground, another dominant studio in the adult-film industry.



She's been stripping all along too, except for a forced interlude last year after she broke her back in a horse-riding accident. "A lot of the bookings were already in place before all the current things came to light," Daniels says. In fact, there really is no "Make America Horny Again" tour per se. The name was concocted independently by a club owner in South Carolina, and "other clubs just jumped on board," she says. The "Make America Horny Again" tour – a name Daniels finds irksomely cheesy – has evolved around her, almost independent of her, much like the maelstrom involving the payment and the president, with one key difference: Unlike the Trump and Stormy scandal, if she wants to turn the tour off, she can. But Stormy Daniels is facing her newfound infamy head-on.

"I can't make it go away," she says. "I don't have a magic wand to erase what people are saying. So I have two choices: Sit at home and feel sorry for myself, or make lemonade out of lemons." She was already dancing – now she's dancing more, for a much higher rate. "I would be a fucking idiot to turn it down," she says. "We live in a capitalist society. I think if anyone, in any field, was approached and someone said, 'Hi! You know that job you are already doing? Would you like to do it next week for quadruple your normal pay?' Show me one person who would say no."



Daniels is currently on a "Make America Horny Again" strip-club tour – though she finds the name irksomely cheesy. Patrick Fallon/ZUMA



About eight hours before showtime, I join Paige on a Walmart run for props: a laundry basket, a sponge, squirt guns and body wash. Daniels would have only a light dinner before that night's show, so Paige and I stop at a Chipotle. As we sit eating our burrito bowls, I ask her what it was like when the Trump news broke.

"It was just weird to me, because I remember being on set years ago and we would hear him calling all the time – it was like a joke," Paige says. "She would put him on speakerphone and walk away and he'd still be talking." At the time, no one thought much about it, she says, because there wasn't much to it.

"She was just a girl that met a rich dude that runs pageants, and, like, 'Fuck it, let's go hang out, who cares?'" Paige says. "Who hasn't gone and fucked someone we regret?"

When we get back to the hotel, Paige disrobes almost immediately and starts romping around the room naked, getting ready for the night. As Daniels and I sit down to talk some more, barely audible moans start issuing from the room next door, then a loud and distinct cry of arousal – by the sound of it, someone is having rather good sex.

Paige and I press our ears against the wall. "Look at you two," Daniels says with mock ridicule. "Should I offer to give them some direction?" All of us laugh.

On the surface, Daniels seems to be having fun with everything going on. But underneath her peppy, inviting façade, this looks like an ordeal for her. In addition to come-ons from fans, she gets a steady stream of hateful messages on social media, mostly from women – I watch them pour in all afternoon while we talk. She's quick to brush off all the hate mail, but she also keeps showing it to me, as if to convince me, and perhaps herself, of how little it bothers her.

"Don't get me wrong, I'm not an angel," says Daniels. "I'm capitalizing on this."

Then there are the news reports she says are untrue. She shows me an item in TMZ that she says falsely claims she took her dirty laundry to a strip-club appearance – for years she’s used a Walmart laundry basket to carry her show props. There was a report in the *Los Angeles Times* in which a club manager is quoted complaining of her arriving late – she shows me text messages that she says indicate the club manager flatly disavowing the quote. “I’m trying to salvage my reputation as a stripper!” she says. The trolls that do get under her skin are those who say she, at 38, is too old to be plying the sex-fantasy trade. “I mean, a woman doesn’t reach her sexual peak until 40, right?” she says.

Plus, there’s the fact that there are things she wants to tell me – to tell everyone – that she can’t. She can’t even say why she can’t. She’s frustrated.

“It’s supershitty,” she says, looking me dead in the eyes, moaning neighbors in the background. “I’m just trying to do things to keep it fun.”

Amid all of it, her life – the quiet, private life that has almost nothing to do with porn or Trump – has been turned upside down.

Daniels lives with her daughter and partner in a quiet community in the Dallas metro area, where she keeps seven horses, including a pony for her little girl. She’s a nationally ranked equestrian (the back injury last year was from a show-jumping accident), and her personal Instagram account is of the wife-and-mother variety, riddled with pictures of horses. Though she doesn’t talk to her mom or her biological father, she’s close to the celebrity photographer Keith Munyan, who is a generation older than Stormy and also grew up in small-town Louisiana. (She calls Munyan her dad.)

Glendon Crain, whom she’s been with since 2009, is a professional heavy-metal drummer who has played in bands like Godhead and Hollywood Undead and toured alongside the likes of Katy Perry and Korn; he’s not unaccustomed to dealing with media, but the scale and intensity of this have been something else entirely. Since the story broke, Daniels says, she’s been hounded by reporters, disinvited from a friend’s wedding, and seen her daughter disinvited from a birthday party.



"My daughter didn't deserve any of this," Daniels says. "[Crain] didn't deserve any of this. Don't get me wrong, I'm not an angel. I'm capitalizing on this." But the idea that she needed 15 minutes of fame, or orchestrated or wanted any of this, she says, is absurd. "I didn't retire, I wasn't trying to retire, I wasn't in any sort of need to do this," she says. "It eclipses everything else that I've worked hard on that I wanted to be known as, and I was very happily living incognito back home."



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1 MONTH AGO





When we arrive at the Vivid strip club in Houston, the place is almost sleepy, with blank-faced women bouncing and rotating under purple lights while a few dozen men drink beers and watch. There's a bar along the length of one wall and a fish tank in the corner where a hallway leads to the smoking patio and the private rooms in the back. In a small beige-and-brown, paper-strewn office in the bowels of the club, Daniels sits at the desk and takes her props out of a suitcase. She asks me to light some candles, which she tucks away in another room to burn undisturbed for a while.

A little after 11 p.m., it's finally time for Daniels to hit the stage. The Cult's "Fire Woman" kicks off as she walks out, and she struts up and down the catwalk in a hooded red cape. She's got intense in-character focus, and the place transforms. "Is that really her?" a guy standing at the tip rail says to no one in particular. Daniels lays down a blanket at the front of the stage and places her tray of burning candles on it. She lifts one up to her face, pours wax down her enormous breasts and into the front of her G-string. She orders a guy at the tip rail to spin around and lay back onto the stage, then drops her crotch onto his face, writhing over him. Paige works the crowd, eliciting tips, and at the end of the set, about 15 minutes after it began, she scurries about the stage sweeping up cash. Daniels cleans up and, around midnight, sits at a table to sign fan merch before doing it all again in a couple of hours. No one can say she doesn't work hard for her money.

Watching Daniels that night in full command of the crowd, titillating strangers for cash and flirting with her fans like a pro, I think of how she's portrayed as a dumb bimbo in the *SNL* parody, in which Cecily Strong says that in 2018 Stormy Daniels is the hero America deserves. Whether that's true or not, in 2018 Stormy Daniels may be the hero America needs.

A decade and a half working in porn imbues a person with an unusual frankness, a kind of extreme authenticity. A successful porn star with a career like Daniels' must be comfortable in her own skin and with other people's bodies, including the weird-looking parts (penises and vaginas, anuses and perineae), and with the various kinds of discharge the human body produces – all things the rest of us would rather stop thinking about

when the erotic moment has passed and we put our clothes back on. Porn stars also have to be comfortable dwelling in the contradictions of porn: in fans' fantasies, but also in the mundane world of bills, groceries, hobbies and, in Daniels' case, being a mom; in exposing the most intimate parts of themselves doing one of the most intimate things humans do, while maintaining a life as an authentic person who feels passion and love. Maybe what America needs most in 2018, as we stew in rage, simultaneously enthralled, bewildered and revolted by ourselves, is a porn star to help us take a long, uncompromising, compassionate look at our country and culture, gross parts and all.



Daniels before her Long Island appearance earlier this year. Mike Pont/Getty

At around 3 a.m., back in the office, Daniels changes into street clothes and deflates a sex doll she had used in her act. She and Paige pack up her props and costumes and count out cash to tip the DJ. She gathers up her things, takes one last glance around the room where she'd prepped for two shows a night, three nights in a row, and flashes me a smile.

"Time to go put my G-strings in the freezer!"

Though she didn't mention it once, throughout the course of the day we spent together, Daniels had been staring down the barrel of a restraining order filed by Michael Cohen to prevent her from speaking about the alleged affair or the NDA. She'd learned of it when she landed on her flight to Houston. She had recently retained a new attorney who was aggressively representing her interests, but when we met, the precise meaning of the restraining order was not yet clear and the fact of its existence not yet something she could discuss.

On the following Tuesday, Daniels filed a lawsuit against Donald Trump asking the court to declare the NDA she signed regarding the alleged affair invalid on the grounds that Trump himself never signed it. In her complaint, she confirmed that the affair took place and alleges that in



myriad ways Cohen, acting as Trump's agent, has intimidated and coerced her from October 2016, when she first agreed to sign the agreement, to the present.

"I was fine with saying nothing," Daniels tells me when we catch up over the phone a few days later. "But I am not fine with being bullied into lying, or being bullied at all.

"Standing up to bullies is kind of my thing," she says, cheerfully. "They started it."

Press Secretary Sarah Huckabee Sanders denied Daniels' claims when asked yesterday. Watch below.



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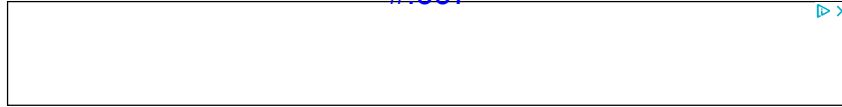
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by NATALIE FINN | Wed., Oct. 12, 2011 2:51 PM



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So false.

Both Trump *and* Daniels are vehemently denying the story about the two of them hooking up after Trump had played in a golfing event and then meeting up multiple times afterward.



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Daniels herself told E! News that she's not commenting, but the story is "bulls--t."

So you can imagine what Trump's lawyers are saying.

MORE: Why Did Donald Trump Turn Down Kim Kardashian's Wedding Invitation?

"The totally untrue and ridiculous story written by *Life & Style* Magazine about Donald J. Trump emanated from a sleazy and disgusting website which, upon strong notification, fully withdrew its posting," read a statement to E! News from Michael Cohen, executive VP and special counsel to Trump.

"Correctly, upon seeing that the article was false, all other publications likewise withdrew and did not write their article. *Life & Style* magazine, however, informed our attorneys that 'it is too late...we have already gone to print and distribution,' even though, in fact, they were properly informed prior to going to print. The Trump Organization and Donald J. Trump will be bringing a lawsuit against the magazine.

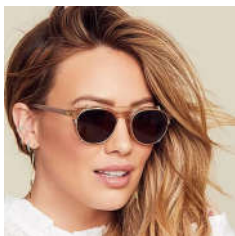
"At the same time," Cohen concluded, "Mr. Trump and the Trump Organization would like to thank and commend Stormy Daniels and her attorneys for their honesty and swift actions."

A-plus for the XXX star!

GALLERY: Today's Hottest Pics

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Exhibit H



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E-mail bblakely@blakelylawgroup.com

March 27, 2018

VIA EMAIL & U.S. MAIL

Mr. Michael J. Avenatti
Avenatti & Associates, APC
520 Newport Center Drive, Suite 1400
Newport Beach, CA 92660
Email: mavenatti@eoalaw.com

Re: **Clifford v. Trump, et. al.**
Case No. 18-cv-02217-SJO-FFM

Dear Mr. Avenatti:

I am writing to request an in-person meet and confer conference pursuant to Local Rule 7-3 regarding the First Amended Complaint you recently filed. Defendant Michael Cohen is considering filing an anti-SLAPP motion pursuant to California Code of Civil Procedure §425.16 in connection to Clifford's Second Cause of Action for Defamation. Under the statute, "[a] cause of action against a person arising from any act of that person in furtherance of the person's right of petition or free speech under the United States or California Constitution in connection with a public issue shall be subject to a special motion to strike, unless the court determines that the plaintiff has established that there is a probability that the plaintiff will prevail on the claim."

Here, Cohen's alleged statement arose in connection with a public issue. *See e.g., Paris Hilton v. Hallmark Cards et al.*, 580 F.3d 874 (9th Cir. 2009). Ms. Clifford will have the burden of establishing that there is a probability of her prevailing on her defamation claim.

As set forth in the First Amended Complaint, Clifford's defamation claim is premised on the following statement by Mr. Cohen:

"Just because something isn't true doesn't mean that it can't cause you harm or damage. I will always protect Mr. Trump."

"Defamation consists of, among other things, a false and unprivileged publication, which has a tendency to injure a party in its occupation." *Wilbanks v. Wolk* (2004) 121

March 27, 2018

Page 2

Cal.App.4th 883, 901. *Washer v. Bank of America* (1948) 87 Cal. App. 2d. 501, 509. The *sine qua non* of recovery for defamation ... is the existence of falsehood.’ Because the statement must contain a provable falsehood, courts distinguish between statements of fact and statements of opinion for purposes of defamation liability. Although statements of fact may be actionable as libel, statements of opinion are constitutionally protected.” *McGarry v. University of San Diego* (2007) 154 Cal.App.4th 97, 112.

Truth is an absolute defense to defamation. *Washer v. Bank of America* (1948) 87 Cal. App. 2d. 501, 509. Nothing about the aforementioned statement, which is not directed at anyone in particular, is untrue. Indeed, as of this date, Ms. Clifford had stated on at least three different occasions, including in a letter that she signed one month before Mr. Cohen’s alleged statement, that she did **not** have an intimate relationship with Mr. Trump. Thus, her statements which are completely contradictory—that she did **not**, and that she did, have an intimate relationship—cannot both be true.

Ms. Clifford's defamation claim also will fail because when Mr. Cohen made the alleged statement, he was engaging in his constitutionally protected right to express his opinion. “Under the First Amendment there is no such thing as a false idea. However pernicious an opinion may seem, we depend for its correction not on the conscience of judges and juries but on the competition of other ideas.” *Gertz v. Robert Welch, Inc.* 418 U.S. 323, 339-340 (1974).

Finally, Ms. Clifford will be required to establish a prima facie claim that she suffered actual damages. Because the purported libelous statement would require further consideration of extrinsic facts, it is not libel *per se*. Cal. Civil Code §45a. Thus, Ms. Clifford would have to prove that she suffered special damages as a proximate result thereof. Again, as of the time Mr. Cohen made this statement, Ms. Daniels had stated on at least three different occasions that she did **not** have an intimate relationship with Mr. Trump. Even if one were to distort Mr. Cohen's statement to the length that you attempt in the First Amended Complaint, it can hardly be said that Mr. Cohen's statement, which nowhere contradicts Ms. Clifford's stated position at this time, somehow damaged Ms. Clifford.

Should Ms. Clifford's defamation claim fail to survive an anti-SLAPP challenge, she would be held responsible for Mr. Cohen's legal fees.

Moreover, you have exposed yourself personally to potential sanctions for filing a frivolous pleading in violation of Federal Rule of Civil Procedure, Rule 11, which was

March 27, 2018

Page 3

enacted to deter abusive pretrial tactics and to streamline litigation by excluding baseless filings. *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 392-393; *Golden Eagle Distributing Corp. v. Burroughs Corp.*, 801 F. 2d 1531, 1542 (9th Cir. 1986).

We therefore ask that you reconsider Ms. Clifford's Second Cause of Action for Defamation against Mr. Cohen, and stipulate to the voluntary dismissal of same.

I have a trial beginning on April 3, 2018 in another matter and therefore request that we hold the meet and confer conference regarding Mr. Cohen's anti-SLAPP motion **this week**. As the prior meet and confer conference was held at my office, I'll be happy to travel to Newport Beach for this one.

Naturally, all of my client's claims are expressly reserved and none are waived.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brent H. Blakely", with a long horizontal stroke extending to the right.

BRENT H. BLAKELY

cc: Charles J. Harder, Esq. (via email)
Ryan Stonerock, Esq. (via email)

Exhibit I

From: Brent Blakely <bblakely@blakelylawgroup.com>
Sent: Friday, March 30, 2018 11:44 AM
To: mavenatti@eoalaw.com
Cc: Charles Harder; Ryan Stonerock
Subject: RE: Clifford v. Trump, et al; Case No. 18-cv-02217-SJO-FFM
Attachments: 20180327-M&C Ltr re CA anti-SLAPP motion.pdf

Dear Mr. Avenatti:

I am writing to address three issues:

1. **Meet and Confer re: Michael Cohen's Anti-SLAPP Motion:** We have yet to receive a response to my March 27, 2018 letter requesting a meet and confer regarding Mr. Cohen's contemplated motion. (attached) It is disappointing that you have not responded given that you have had plenty of time to discuss this case on numerous national news shows. As previously indicated, I will be in trial beginning on Tuesday, April 3rd. Thus, please let me know your availability this afternoon, over the weekend, or on Monday. Also, please be advised that Mr. Cohen intends to concurrently file a Motion to Dismiss under FRCP 12(b)(6) on the basis that your client's second cause of action fails to state a claim for relief.
2. **Extension of EC/Mr. Trump's Deadline to Respond to FAC:** EC and defendant Donald J. Trump request that your client stipulate to a 30 day extension of their deadline to file a responsive pleading or Rule 12 motion. In light of EC's upcoming motion to compel arbitration, we request this extension in the interests of judicial economy. We also note that Section B.2. of the Central District's Civility and Professionalism Guidelines states, in part: "Unless time is of the essence, as a matter of courtesy we will grant first requests for reasonable extensions of time to respond to litigation deadlines." If your client is not agreeable to this extension, we will have no choice but to raise this issue with the court.
3. **Service of the First Amended Complaint on Michael Cohen:** My office will agree to accept service of the First Amended Complaint on behalf of Michael Cohen. Please have the First Amended Complaint and Summons served on my office address, which is below.

We look forward to your prompt response.

Regards, Brent Blakely

Brent H. Blakely, Esq.
Blakely Law Group
1334 Parkview Ave., Suite 280
Manhattan Beach, California 90266
Telephone: 310.546.7400
Facsimile: 310.546.7401
www.blakelylawgroup.com

From: Monica Lawal [mailto:mlawal@blakelylawgroup.com]
Sent: Tuesday, March 27, 2018 1:44 PM
To: mavenatti@eoalaw.com
Cc: Brent Blakely; charder@harderllp.com; Ryan Stonerock
Subject: Clifford v. Trump, et al; Case No. 18-cv-02217-SJO-FFM

Dear Mr. Avenatti,

Please see attached from Mr. Blakely.

Regards,

Monica Lawal
Blakely Law Group
1334 Parkview Avenue, Suite 280
Manhattan Beach, California 90266
T: 310.546.7400
F: 310.546.7401

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Exhibit J

Interviews by Michael Avenatti

#	Date	Title of Show	Network	Host
1.	3/7/18	Anderson Cooper 360°	CNN	Anderson Cooper
2.	3/7/18	CBS This Morning	CBS	Gayle King
3.	3/7/18	The Today Show	NBC	Savannah Guthrie
4.	3/9/18	Anderson Cooper 360°	CNN	Anderson Cooper
5.	3/9/18	The Beat With Ari Melber	MSNBC	Ari Melber
6.	3/9/18	New Day	CNN	Chris Cuomo
7.	3/12/18	New Day	CNN	Chris Cuomo
8.	3/12/18	The Beat With Ari Melber	MSNBC	Ari Melber
9.	3/12/18	All Things Considered	NPR	Ari Shapiro
10.	3/16/18	New Day	CNN	Chris Cuomo
11.	3/16/18	Anderson Cooper 360°	CNN	Anderson Cooper
12.	3/16/18	The Lead With Jake Tapper	CNN	Jake Tapper
13.	3/19/18	AM Joy	MSNBC	Joy-Ann Reid
14.	3/19/18	The Beat With Ari Melber	MSNBC	Ari Melber
15.	3/20/18	Anderson Cooper 360°	CNN	Anderson Cooper
16.	3/20/18	The Last Word	MSNBC	Ari Melber
17.	3/21/18	Fox News @ Night	Fox News	Shannon Bream
18.	3/22/18	The Lead With Jake Tapper	CNN	Jake Tapper
19.	3/26/18	Morning Joe	MSNBC	Joe Scarborough
20.	3/26/18	New Day	CNN	Alisyn Camerota
21.	3/26/18	Anderson Cooper 360°	CNN	Anderson Cooper
22.	3/26/18	The Last Word	MSNBC	Lawrence O'Donnell

23.	3/26/18	CBS This Morning	CBS	Gayle King
24.	3/26/18	Good Morning America	ABC	George Stephanopoulos
25.	3/26/18	The Today Show	NBC	Savannah Guthrie
26.	3/27/18	All In With Chris Hayes	MSNBC	Chris Hayes
27.	3/28/18	Anderson Cooper 360°	CNN	Anderson Cooper
28.	3/28/18	CBS This Morning	CBS	Gayle King, Anthony Mason and Norah O'Donnell
29.	3/29/18	Wolf	CNN	Wolf Blitzer
30.	3/30/18	New Day	CNN	Alisyn Camerota
31.	3/29/18	Erin Burnett OutFront	CNN	Erin Burnett
32.	3/30/18	New Day	CNN	Alisyn Camerota
33.	4/4/18	Anderson Cooper 360°	CNN	Anderson Cooper
34.	4/4/18	Megyn Kelly Today	NBC	Megyn Kelly
35.	4/4/18	New Day	CNN	Alisyn Camerota
36.	4/5/18	The Beat With Ari Melber	MSNBC	Ari Melber